

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

KATHLEEN BROWN, )  
 ) Civil Action No. 03-224  
Plaintiff, )  
 ) JURY TRIAL DEMANDED  
v. )  
 )  
COST COMPANY, )  
 )  
Defendant. )

**PLAINTIFF'S FIRST REQUEST**  
**FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 34 Fed.R.Civ.Pro., Plaintiff hereby requests that Defendants produce any and all of the following documents:

1. Provide any documents you provided the EEOC in connection with the charge of Kathleen Brown.

**RESPONSE:**

2. Provide any reports, statistics or data you provided to the Commonwealth of Pennsylvania or the federal government concerning the employment of females and minorities in connection with the construction of the Marienville prison construction project.

**RESPONSE:**



3. Provide all the applications for employment received by you in connection with the Marienville project.

**RESPONSE:**

4. Provide all documents which evidence or contain information about who was hired for the Marienville project.

**RESPONSE:**

5. Provide any documents evidencing your hiring practices, policies, or procedures, in connection with the SCI Marienville project.

**RESPONSE:**

6. Relative to persons who submitted applications, but who were not hired, provide any documents that pertain in any way to the decision not to hire.

**RESPONSE:**

7. Provide any documents evidencing communications between you and any referral sources of applicants for the Marienville project.

**RESPONSE:**

8. Provide any documents evidencing communications between you and any union representing workers employed by you in connection with the Marienville project.

**RESPONSE:**

9. Provide any documents evidencing the Collective Bargaining Agreement, about practices, understandings or understandings with any labor union whose members worked on the Marienville project.

**RESPONSE:**

10. Provide all documents evidencing compensation paid to members of the laborers union or heavy equipment operators union, including payroll records showing overtime awarded, and/or the overall compensation paid to each employee who worked on the Marienville project.

**RESPONSE:**

11. Provide any and all employment rosters, lists or records concerning the identity and gender of employees who worked on the Marienville project, including documents showing dates and hours the employees worked.

**RESPONSE:**

12. Provide any documents evidencing the reason the employment application(s) of Kathleen Brown was rejected.

**RESPONSE:**

13. Provide any documents evidencing communications between you and Kathleen Brown.

**RESPONSE:**

14. Provide any documents evidencing any commitment, goal or undertaking to employ minorities or women on the Marienville project.

**RESPONSE:**

Respectfully submitted,

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Edward A. Olds, Esquire  
Pa. I.D. No. 23601  
1007 Mount Royal Boulevard  
Pittsburgh, PA 15223  
(412) 492-8975

CERTIFICATE OF SERVICE

I, Edward A. Olds, hereby certify that a true and correct copy of the foregoing was served upon the following by United States First Class Mail, Postage Prepaid.

Michael J. Pawk, Esquire  
LUTZ, PAWK & MCKAY  
Holly Pointe Building, Suite 105  
220 South Main Street  
Butler, PA 16001

Date: \_\_\_\_\_

\_\_\_\_\_  
Edward A. Olds, Esquire